

1 MICHAEL LEHNERS, ESQ.
2 429 Marsh Ave.
3 Reno, Nevada 89509
4 Nevada Bar Number 003331
5 email: michaellehners@yahoo.com
6 (775) 786-1695
7 Attorney for Debtor

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITES STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

oOo

IN RE:

CASE NO.: 14-51413-btb
(Chapter 11)

SPEED TECHNOLOGIES, LLC,

HRG. DATE: _____

Debtor.

AND TIME: _____

_____/

**EX-PARTE MOTION FOR ORDER SHORTENING TIME OF MOTION TO COMPEL
TURNOVER OF ESTATE PROPERTY**

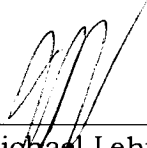
COMES NOW Debtor, SPEED TECHNOLOGIES, LLC., by and through undersigned counsel and files the following ex parte motion to hear the Motion for Turnover on shortened time. Said motion for turnover must be heard on shortened time so that the Debtor can get the estate property back, which is necessary for it to do business and effectively reorganize itself. Specifically, Speed Technologies is engaged in the business of off road racing. It owns superlight race trucks. These vehicles compete in closed track racing, such as the kind sponsored by the Lucas Oil Series. It offers its customers the opportunity to learn how to drive a professionally prepared off road race vehicle and then have access to a professionally designed and prepared track under actual race conditions. Bianchi Estates locked out the Debtor in May of 2014. The Debtor needs access to its equipment as soon as possible so it can have classes before the cold weather sets in. Accordingly, Counsel is requesting that the Motion be heard on shortened time. Counsel has spoken to Sallie Armstrong,

1 Esq., the attorney for Bianchi Estates, LLC. She will not be available for a hearing
2 until after September 16, 2014.

3 Rule 9006(c) allows the court to reduce the time for taking action except that
4 allowed under Rules 1007(c) *{The time fixed to file the Statement required by Rule*
5 *1007(b)(7)}*, 2002(a)(7) *{The time fixed for filing proof of claims}*, 2003(a) *{Meeting of*
6 *Creditors or Equity Security Holders}*. 3002(c) *{Time for filing proofs of claim}*, 3014
7 *{Election Under § 1111(b)}*, 3015 *{Filing, Objections to Confirmation, or Modification of a*
8 *Plan}*, 4001(b)(2) *{Use of cash collateral}*, 4001(c)(2)
9 *{Obtaining credit}*, 4003(a) *{Claim of exemptions}*, 4004(a) *{Grant or Denial of Discharge}*,
10 4007(c) *{Determination of Dischargeability of a Debt}*, 4008(a) *{Filing of Reaffirmation*
11 *Agreement}*, 8002 *{Time for Filing Notice of an Appeal}* and 9033(b) *{Review of Proposed*
12 *Findings of Fact and Conclusions of Law in Non-Core Proceedings}*. In addition, the
13 court may not reduce the time under Rule 1007(c) to file the statement required by
14 Rule 1007(6)(7) *{Statement of completion of a course concerning personal financial*
15 *management}*.
16
17

18 The instant motion falls under none of these categories. Since Rule 9006
19 authorizes the shortening of time to hear this motion, and there are exigent
20 circumstances present. Movant respectfully requests that time be shortened

21 Dated this ____ day of September, 2014.

22
23
24 
25 Michael Lehnert, Esq.
26 429 Marsh Avenue
27 Reno, NV 89509
28 (775) 786-1695
Attorney for Debtor